



Iowa Statewide Emergency Solutions Grant

2017 Calendar Year Draft Competition Plan

Public Comments Received with IFA Responses

Updated 5/27/2016 to include a previously missing comment (#6 below)

Comments Received:

On April 15, 2016, the Iowa Finance Authority issued proposed key elements of the upcoming competition. These are outlined in this document. The Authority invited stakeholder comments through Friday, May 6, 2016. Comments were to be submitted by email to amber.lewis@iowa.gov, or during a public hearing from 10:00 – 11:00 a.m. on Wednesday, April 27, 2015, at the Iowa Finance Authority, 2015 Grand Avenue, Des Moines, Iowa, 50312. The Iowa Finance Authority considers all comments in the final drafting of application materials.

Received comments with IFA responses are included at the end of this document.

Background:

The Iowa Finance Authority is preparing to open the competition for the Iowa Statewide Emergency Solutions Grant (ESG), for the 2017 Calendar Year. Information about the Iowa ESG program can be found here: <http://www.iowafinanceauthority.gov/Public/Pages/PC83LN13>. Information about the federal ESG program, from the U.S. Department of Housing and Urban Development (HUD), can be found here: <https://www.hudexchange.info/esg/>.

The 2017 ESG competition will follow much of the same basic structure as the 2016 competition. Many application items are likely to be similar. This document contains many of the items that the Iowa Finance Authority considers most important, especially those that represent changes from last year. However, all aspects of the competition are open for comment. Interested parties may review the Draft 2017 ESG Application for additional items for comment. The Draft 2017 ESG Application is available on this page, under the section for the 2017 ESG Program:

<http://www.iowafinanceauthority.gov/Home/DocumentSubCategory/49>.

2017 Application Training Webinar:

An application training webinar is scheduled for Monday, May 23, 2016, at 11:00 a.m. Slides may be made available afterward for later viewing. Registration is available here:

<https://attendee.gotowebinar.com/register/1675156916250596612>.

Funding Available:

Projected funds available for subgrantees for calendar year 2017 are approximately \$2.4 million.

Scoring:

Recent competitions proposed selected items for “bonus” points, above 100 “regular” points. The intent was to call out certain items as particular priorities of each competition. The Draft 2017 Competition Plan has a simpler structure; it eliminates the bonus scoring and scores all items within a total of 100 points. The priority items that were previously called out as bonus items are instead included elsewhere in the application, with some slight updates (for example, the previous two bonus items that focused on veterans and families with children/youth, respectively, are instead proposed as one combined question focused on the four priorities of the federal *Opening Doors* plan, in which veterans and families with children/youth represent two of the plan’s four priorities).

Rapid Rehousing Funding Priority:

The Iowa Finance Authority proposes to prioritize \$1,000,000 for Rapid Rehousing, out of the total ESG funds available. This is consistent with the 2016 competition plan. The priority is in line with HUD’s focus on Rapid Rehousing; for example, in this 2014 *SNAPS In Focus* message:

<https://www.hudexchange.info/news/snaps-in-focus-rapid-re-housing-as-a-model-and-best-practice/>.

Applications for Rapid Rehousing would still have to meet a minimum threshold for funding, and the final funding amount may be lower or higher than \$1,000,000, depending on the quality and number of applications received.

Funding Limit Per Agency and Per Category of Assistance:

The 2016 ESG competition placed a maximum of \$150,000 total per agency. It further placed a limit of \$100,000 on any single category of assistance (Street Outreach, Shelter, Rapid Rehousing, or Homelessness Prevention). These limits are proposed to remain in place for 2017.

Data Collection and Reporting Requirements:

It is a HUD requirement that all funded ESG agencies collect and submit client data through a Homeless Management Information System (HMIS), with this exception: Agencies that are primarily designed to serve victims of domestic violence (DV) are prohibited from entering data into an HMIS, and must submit data instead through a comparable database that meets all federal standards for such systems. In Iowa, the approved HMIS provider is the Institute for Community Alliances, and the system currently in use is ServicePoint. Beginning in 2015, DV agencies had the option of using a non-HMIS implementation of the ServicePoint system, also provided through the Institute for Community Alliances.

This competition proposes that DV agencies funded through ESG for 2017 will be required to continue to use the ServicePoint system to report and submit client data.

Selected New Questions:

Each year we eliminate some questions for various reasons. Sometimes we find certain questions were confusing or interpreted differently by different agencies, sometimes questions don't lead to scoring that is helpful in differentiating applicants from one another, and sometimes we find new priorities that take the place of older questions. A few questions were eliminated from last year's application, and some new questions proposed, such as those below.

- Program Design: There are some new questions about an agency's reporting of bed availability on the annual Housing Inventory Chart.
 - Experience and Capacity section, Question 8: A question about an agency's efforts toward continuous quality improvement, through use of the Iowa Quality Standards or other means.
 - Community Partnerships and Need section: Some new questions about local/regional community planning groups.
 - Performance: Question 5, focused on an agency's participation in the annual Point-in-Time and Housing Inventory Count data collection efforts.
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Comments Received with IFA Responses:

- 1) Katie Cook, Upper Des Moines Opportunity, Inc.:
 - a. What will be allowable match for this year's grant application? Will LIHEAP be allowed?
 - b. In previous years we were asked to better clarify client outcomes and also gain follow up information, which is done through documentation in HMIS system. Are you wanting specific goals and outcomes listed here?
 - c. Additionally, if we state within the application that we meet HUD eligibility requirements is this not enough explanation?

RESPONSE: a) IFA follows federal ESG match requirements, and updates guidance as HUD issues it. As of this writing, our understanding is that HUD allows LIHEAP as ESG match, provided it is documented carefully and follows all requirements as described in the ESG Interim Rule; b) Unclear where in the application this question is directed; c) No, this would not typically be enough explanation for most purposes. As a federal program, the minimum is that programs all meet HUD requirements. The application questions are intended to elicit additional information that will provide details and assurance regarding how agencies will meet the requirements.

- 2) Ashley Schwalm, Family Resources:
 - a. Our agency isn't opposed to having a cap on the amount of funding requested total which is \$150,000, but we would like to see there not be a cap within each single category of assistance. For programs trying to change their focus from providing shelter to rapid re-housing, having a cap on the amount of dollars limits the resources available to assist in changing the focus.

In regards to proposing to require use of the ServicePoint non-HMIS system for all ESG-funded DV agencies—regardless of any other data systems that also may be used by agencies to meet the reporting requirements of other grants. By requiring DV agencies to use ServicePoint along with the other database systems used reduced the amount of time staff are able to advocate and provide case management to survivors because staff will be entering more data into another system. Currently, the Crime Victims Assistance Division is requiring all providers to use the database system called ClientTrack. ClientTrack will be set up to run all needed reports including reports for ESG. Being required to use ClientTrack on top of our current database system we are required to use within our agency and another IL database will require our agency to utilizes 4 different databases. If DV agencies are able to pull the necessary information and create reports needed to submit to ESG, this should be allowable.

RESPONSE: To the first comment, the cap on assistance by category is retained for now, but further attention will be given to this issue for possible adjustment in future competitions. ESG funds are limited, and requests for assistance significantly exceeded available funds during the most recent competition. IFA supports the expansion of Rapid Rehousing through ESG, but also wants to see such assistance become more widely available in different areas of the state and in serving different populations. Larger grants amounts in the future would ideally also be associated with programs that serve a larger geography, serve a larger segment of the population of those experiencing homelessness (fewer eligibility restrictions), and/or can otherwise justify the need for funds in relation to the need elsewhere in the state. As the state moves to more coordinated regional/local systems of care, this should all come into greater focus.

To the second comment, IFA is carefully considering the comments submitted regarding DV data collection and reporting. This includes thorough comments submitted by ICADV—both initial comments and additional comments in response to specific follow-up questions from IFA. Please see this response at the end of this document.

3) Virginia Griesheimer, ACCESS:

- a. My only comment on the ESG draft is the mandated use of ServicePoint for DV agencies. While I recognize that this may make data collection and compilation for the CAPER more efficient, my concern is that of the true confidentiality of client-level data. Our clients, by and large, are not always comfortable with the current disclosures on the authorization for release of information; these individuals do not like the idea of a third-party being able to remotely access their personal information during a call for tech support regardless of the confidentiality that these workers are bound to. Our clients deserve to have as much control over their information and who accesses it as they possibly can.

I hope that a good-faith effort will be made to consider ClientTrack as a reasonable alternative for DV service providers after it goes live next month. If it can be proven to be a viable alternative I would hope to see the mandate for the use of ServicePoint by

DV agencies to fall away. The feature of ClientTrack that does not allow information to virtually flow back up to administrators and tech support is much more in line with VAWA than the current system. The only thing that would make it more secure is if the vendor was only able to see aggregate data, but I know that is not possible at this point. I strongly feel that if client-level information is kept within the agency that is collecting it, we will see fewer people opting to be entered anonymously or not entered at all, thus providing IFA and our other funders with more accurate data.

I appreciate the opportunity to provide feedback on the draft and hope that these concerns will be taken into consideration as you make the final revisions.

RESPONSE: IFA is carefully considering the comments submitted regarding DV data collection and reporting. This includes thorough comments submitted by ICADV—both initial comments and additional comments in response to specific follow-up questions from IFA. Please see this response at the end of this document.

4) Mark Sertterh, Shelter House:

- a. My comments are that the Iowa Statewide ESG program should not allow Transitional Housing programs to receive funds for shelter operations even if they qualify for through the interim rule of eligibility if they received FY 2010 Emergency Shelter Grant funds, or at least they should be on a 2nd tier of prioritizing. With HUD putting a priority on Rapid Rehousing and Housing First Programs, I think ESG should follow that lead and start prioritizing in that way and moving away from funding Transitional Housing on the same tier. It is also a very different service than emergency shelter that is funded through ESG.

RESPONSE: IFA agrees that the ESG program should come into closer alignment with the CoC Program and HUD's clear direction on transitional housing. This includes consideration regarding the differences between transitional housing for the general homeless population, and specialized transitional housing programs for youth, domestic violence survivors, or substance abuse. In accordance with HUD's direction to communities that ESG grantees and CoCs should consult together regarding ESG policies and priorities, IFA seeks input on this issue from the four CoCs in Iowa that benefit from ESG statewide funds (beyond input from individual agencies). IFA also intends to work during the coming year on a future policy direction regarding transitional housing in ESG, and anticipates changes that would take effect beginning with the 2018 calendar year. For the upcoming 2017 calendar year, no immediate changes will be made.

5) Iowa Coalition Against Domestic Violence, Zeb Beilke-McCallum:

Data collection standards are always emotional topic for victim service providers, and sometimes a contentious one. Because the security stakes can be high. In Iowa, however, the Iowa Coalition Against Domestic Violence (ICADV), Iowa Finance Authority (IFA) and the Institute for Community Alliances(ICA) have demonstrated an ability to come together around the same table and work out solutions that are respectful of both victim safety and ensure that service data is reported accurately and timely.

The Coalition is always open to new suggestions/proposals that improve reporting and data collection, however, the recent proposal to require victim services to use the ServicePoint database for 2017 reporting raises several safety concerns for our organization, victim service grantees and survivors.

It is important to reflect on how we arrived at this point. At the end of 2014 and the beginning of 2015, it was clear that victim service programs were struggling to meet the new HEARTH data reporting requirements, and it was placing unfair burdens on IFA staff and victim service agencies. At that time the Crime Victim Assistance Division of the Iowa Attorney General's Office (CVAD) acted by issuing an RFP for the creation of a dedicated victim services database. This turned into a very long process, one that included the foremost experts in victim safety and confidentiality, as well as weighty considerations for HUD reporting, including the CAPER and HUD APR. After an extensive process, a database with a history HUD/HMIS experience called Client Track was selected as the database for victim services.

One of the reasons that the process has taken so long is that everyone involved supported efforts to protect victim safety, including practices and policies that limit third part access to personal information as recognized by the Violence Against Women Act of 2013. In fact, efforts to recognize the dangers posed by easy access to personal information lead the Iowa legislature last year to create the Iowa Safe at Home program.

In the Client Track database, neither ICADV/IowaCASA nor CVAD has access to any personally identifying data. If programs need technical support regarding client data, that support will need to be delivered at the programs confidentially onsite. Client Track will go into full time use with the start of the fiscal year July 1st 2016.

ICADV admits this process has taken much longer than expected, and is thankful to the Institute for Community Alliances (ICA) who were willing to step up and quickly offer a temporary solution to victim service agencies, but like many temporary solution, it isn't a perfect and does create multiplying confidentiality and privacy concerns as it continues. Should IFA proceed with this mandate, victim service programs would be forced to change how they used the ServicePoint database only entering anonymous, non-identifying information into the it to generate the required reports. The Coalition believes this long term such a strategy would be detrimental to data reporting and quality.

We recommend that IFA follow the process they laid out in a February of 2015 (see attached) e-mail to allow the Institute for Community Alliances to fulfill the 2016 grant reporting requirements as the victim services database(Client Track) gets up and going, July 1st 2016. Once the database is live, ICADV asks that you give victim service grantees and CVAD an opportunity to demonstrate that Client Track can meet all of the CAPER and HUD APR requirements. Obviously, ICADV doesn't want to see this process drag into a new grant year so it makes sense to place a deadline for the decision before the beginning of the 2017 grant year.

I have also attached an "old" Client Track CAPER report, to assist IFA in better understanding the Client Track System.

Thank you for your consideration.

INITIAL RESPONSE: To consider allowing DV agencies funded through ESG for 2017 to use Client Track for ESG client data rather than the proposed ServicePoint system, IFA sought additional information from ICADV and the Attorney General's CVAD office on the following questions and

issues. The questions below were posed by IFA, and immediately below the questions are the responses that ICADV provided.

- I. Who is the Client Track system administrator? What are the roles of CVAD and ICADV in managing or supporting this system? Who provides training to agencies? Who provides the on-site technical assistance referenced in ICADV's letter? What are the limitations on this training or technical assistance?

Thank you so much for the questions. With the very specific security model that CVAD, ICADV, and IowaCASA have worked out for the database each individual victim service agency functions as their own system administrator. ICADV/IowaCASA staff lead by ICADV's Technical Support Specialist will provide training to all victim service agencies. Training and technical assistance are limited by staff capacity and limited travel funds. It is ICADV expectation that most technical challenges/trouble shooting will be handed by the system administrator at each local program. This is required to maintain database security.

- II. Which DV agencies in Iowa will be using Client Track?

All CVAD funded victim service agencies currently have access to the Client Track database and beginning July 1st 2016 all CVAD funded victim service agencies are required to use Client Track. The only DV program that currently receives ESG but is not required to use Client Track is the YWCA Clinton. Which I believe is currently using Apricot, but they are in the process of acquiring a new database.

- III. This guidance from HUD, <https://www.hudexchange.info/programs/hmis/hmis-requirements/>, states the following: "It is up to the CoC to work with the HMIS lead to determine if a system is a comparable database. This means that it must be documented that the alternative system meets all HUD system requirements."
 - a. How has the CoC worked with the HMIS lead in Iowa (the Institute for Community Alliances) to determine if Client Track is a comparable database that meets all HUD system requirements?
 - b. How has this been documented?

Question III parts a and b seem like questions for the CoC. To my knowledge the CoC has not made any determinations about comparable databases either Client Track or "non-HMIS" Service Point or any other database.

If it would be helpful, ICADV and/or CVAD would be happy to sit down and take ICA/HMIS lead through the database, in fact we have requested a sit down meeting with ICA and were told that they didn't want to have a meeting until after the ESG rules process had run its course, which made perfect sense to me. However, I also think it makes perfect sense continue the previous IFA innovative to not make a final determination about victim services database use until after the Client track system is up and running.

- III. For the annual ESG CAPER report, is there a system administrator that will provide an aggregate report for all DV agencies, and work individually with the DV agencies to resolve any missing data or discrepancies within the report (such as aggregate totals in different categories not matching up, or other problems)?

The system administrator exists at the local program level, so each victim service agency is responsible for running their own aggregate report. It is possible to run a master report after, each agency has uploaded their own report (ie an aggregate of aggregates) ICADV is planning on providing TA assistance to programs on running of reports and supporting accurate data collection. But as mentioned above this assistance is limited in scope to one or two people.

- IV. Who is responsible for updating the Client Track system whenever HUD issues technical or programmatic updates to their data standards or reporting requirements?

Client Track is responsible for updating the Client Track system current with HUDs technical or programmatic standards. Client Track is used throughout the country as an HMIS database and have more familiarity with HUD then previous DV databases.

- V. What are the specific “multiplying confidentiality and privacy concerns” created by continued use of the current ServicePoint DV System?

ICADV and local victim service agencies always viewed the use of a “non-HMIS” database as an imperfect solution, and that it’s most redeeming factor was that the use of the database and the information shared in it would be time limited. As indicated in earlier comments, I never imagined it would take this long to get Client Track up and running. The security problems with Service Point’s “non-HMIS” system is that the database requires victim service programs, to provided personally identifying client information to ICA, as a temporary option to meet HUD’s immediate reporting requirements, this made sense. As a permanent option it is clearly a violation of the Universal Grant Conditions: Nondisclosure of Confidential or Private Information (VAWA 2013 Section 3: 42 U.S.C. 13925 (a)(20) & (b)(2) and FVPSA 42 U.S.C. 10406(c)(5).

I will say I think some of the clearest guidance regarding victim service provider’s obligations regarding disclosure of personally identifying information comes from HUD themselves in the 2015 NOFA on pg 14, 11.

“Additionally, CoC and ESG recipients must participate in the local HMIS; unless a recipient is a domestic violence provider or legal service provider in which case it must use a comparable database and provide de-identified information to the CoC.”

- VI. If the ServicePoint DV System is continued, why would victim service programs “be forced to change how they used the ServicePoint database only entering anonymous, non-identifying information” to generate reports, as described in ICADV’s comments? Furthermore, if programs made this change, what is the assurance that this still meets HUD’s standard requirements for data collection (knowing that individual program participants always have the right to refuse to disclose any information they choose)?

As mentioned above a careful reading of VAWA, FVPSA and HUD's 2015 NOFA leads me to believe that victim service organizations cannot not be providing personally identifying information to third parties outside of Iowa victim advocate confidentiality. Just to put the threat into perspective, I looked back at ICADV's records and local DV programs have averaged at least one subpoena a year. It is clear, that accurate reporting is vital to continuing efforts to end homelessness in Iowa and DV programs are working to be a partner in the solution. In the spirit of offering solutions, I think there are two options worth consideration by IFA rather than what was initially reposed.

Option 1# DV programs use the HMIS portion of Client Track to generate their ESG/CoC reports and ICADV, IFA, CVAD, ICA and whoever else is willing sits down together to working how victim service agencies can get the training and support to accurately report on their work. The startup of a new database is our opportunity to get this right and provide a model for the nation. Client Track is vastly superior to any of the lessor databases out there (i.e. Alice, Apricot) The reason, ICADV views this as the best option is that this method prevents victim service projects from having to do dual data entry and keeps the reports simple and clear for IFA, one report from the HMIS system, one report from the DV Client Track system.

The second option, which takes into consideration the value and expertise of ICA but is also compliant with HUD, FVPSA and VAWA guidelines, and coincidentally is option that is used in many other states. In this option the victim service providers use HMIS or the "non-HMIS" system run by ICA and provide only the necessary data for generating the CAPER/APR, and all the information would be de-identified. Victim service programs would still collect all the required HUD data elements including personally identifying info in Client Track, thus they would be able to still demonstrate eligibility and provide any required documentation as necessary. This second option I think represents a middle ground between the status-quo and the Client Track database.

RESPONSE: In addition to the comments and information provided regarding this issue, IFA also reviewed this summary document, "Confidentiality: VAWA & FVPSA," by NNEDV: http://nnedv.org/downloads/SafetyNet/VAWA_FVPSA_Confidentiality_2013.pdf. This document helped provide a national perspective and context regarding this issue. One remaining challenge with the current situation is that Client Track is not yet in place, so it's not possible to make a decision based on actual experience using the system in Iowa. And yet, if we wait to see how the system works out once it's in place, while discontinuing use of the current Iowa ServicePoint DV System, then it would likely be challenging to re-engage with the ServicePoint system later on if Client Track doesn't perform as needed.

Our plan to move forward is as follows:

- Current 2016 ESG-funded agencies using the Iowa ServicePoint DV System will be required to continue use of this system through the remainder of 2016, past the initial

scheduled launch of Client Track. This includes planning to submit the full year of data in 2016 for the ESG CAPER, using the ServicePoint system.

- If the Client Track launch stays on schedule, then we should be able to assess its performance at least from July – September 2016. Agencies using both systems during that time should submit aggregate monthly/quarterly reports from both systems, with their draw requests. We will be able to compare reports from both systems and ascertain how well the systems are working to meet grant requirements.
- After September 2016, based partly on an assessment of how well the Client Track system is working thus far and partly on further research, we will make a decision on how we can best move forward with DV data collection and reporting for the new 2017 contract year. We will finalize grant requirements at that time.
- DV agencies planning to submit an application during the 2017 competition should be aware of the possibilities regarding data collection and reporting requirements.

(Note: By IFA staff oversight, the comments below were left out of the original written responses in version 1 of this document. We appreciate the input of stakeholders during this process, and we regret the error.)

6) Crissy Canganelli, Shelter House:

- a. Recommendation: Increase the maximum allowable award for an individual agency with an upper limit of \$300,000 if need is demonstrated. Clearly identify how an agency demonstrates need.
- b. Recommendation: Under Eligible Activities remove the allowance for transitional shelter/housing programs if awarded federal FY2010 ESG funds.
- c. Recommendation: Applicants are prohibited from applying for SAF monies if they are awarded ESG funding and vice versa. This is incongruent with the exception permitted to DV providers which are permitted to receive funds from both the Attorney General's office and ESG for both shelter operations and rapid rehousing. Either remove the prohibition on homeless shelters from applying for both SAF and ESG or apply a prohibition to DV providers preventing award of both ESG and Attorney General funds. At a minimum take the award of Attorney General funds into account and weight in consideration of the duplicated award of extremely limited ESG funds.
- d. Recommendation: Consider establishing maximum ranges for shelter operations based on the total number of unique individuals served.
- e. Recommendation: Under Applicant Profile, if responding Yes to Q8a then the applicant is ineligible under these categories.

RESPONSE: (a) To the first comment, please see response to #2 comment above. The previous comment was regarding limits on categories; the same response will also apply to limits on total grant amounts. (b) See response to #4 comment above. (c) Agencies may receive different grants from a number of federal, state, or local agencies, depending on their focus and population served. Rather than a particular limit according to the source of funds available to any particular agency, our goal for ESG is in line with HUD's direction for Continuums of Care: developing a more coordinated system approach throughout Iowa, so that we are better able to assess need in various areas, identify gaps in services, and coordinate funding to balance the

varying needs of individuals and families seeking homelessness assistance. (d) Also relates to the response to “c” above, regarding developing a more coordinated approach to assessing comparative needs across the state, and providing funding accordingly. (e) See response to (b) above and #4 comment.